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**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

JOSE R. BABIN-DE-JESUS,

Plaintiff,

v.

AMERICAN EXPRESS CO.; BANK OF  
AMERICA, NATIONAL ASSOCIATION;  
CHASE – BEST BUY; CHASE BANK,  
NATIONAL ASSOCIATION; COOP A/C SAN  
RAFAEL; THE HOME DEPOT/CITIBANK  
NORTH AMERICA A/K/A/ THD/CBNA;  
WESTSTAR FEDERAL CREDIT UNION;  
WELLS FARGO FINANCIAL CARDS;  
EQUIFAX INFORMATION SERVICES, LLC;  
EXPERIAN INFORMATION SOLUTIONS,  
INC,

Defendants.

Case No. 2:16-cv-00636-RFB-GWF

**STIPULATION AND ORDER TO  
EXTEND DEFENDANT BANK OF  
AMERICA, N.A.’S TIME TO RESPOND  
TO PLAINTIFF’S OPPOSITION**

It is hereby stipulated and agreed by and between Plaintiff Jose R. Babin-de-Jesus (**Plaintiff**), through his attorney David Krieger, and Defendant Bank of America, N.A. (**BANA**), through its attorneys Darren Brenner and Miles Clark with the law firm of Akerman LLP, as follows:

On March 23, 2016, Plaintiff filed his Complaint (Doc. 1). On April 20, 2016, BANA filed a Motion to Dismiss (Doc. 10). On May 14, 2016, Plaintiff filed his Opposition to BANA’s Motion to Dismiss (Doc. 20). BANA’s reply is currently due by May 14, 2016. Plaintiff and BANA stipulate and agree that BANA shall have until May 23, 2016, in which to file its responsive pleading. This extension will permit BANA the opportunity to fully investigate and respond to the substantive

arguments raised in Plaintiff's opposition.

This is the parties' first request for an extension of time to respond to Plaintiff's Opposition and is not intended to cause any delay or prejudice to any party.

DATED this 13th day of May, 2016.

By:

/s/ David H. Krieger

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By:

/s/ Miles Clark

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*Attorneys for Defendant Bank of America, N.A.*

## ORDER

IT IS ORDERED THAT Bank of America, N.A. shall have until May 23, 2016 to respond to Plaintiff's Opposition.

IT IS SO ORDERED.



RICHARD F. BOULWARE, II  
United States District Judge

DATED: May 16, 2016.